

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST  
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER  
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF JEFFREY C.  
BLOCK IN SUPPORT OF  
DIRECT PURCHASER  
PLAINTIFFS' MOTION FOR  
INTERIM AWARD OF  
ATTORNEYS' FEES, CURRENT  
AND ONGOING LITIGATION  
EXPENSES, AND SERVICE  
AWARDS**

I, Jeffrey C. Block, declare as follows:

1. I am a Partner of the law firm of Block & Leviton LLP. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

- Discovery from Tyson and Smithfield Defendants including analyzing responses and objections to Plaintiffs' request for documents, meet and conferring re: same; preparing reports for custodians, draft motion to compel, prepare reports for search methodology and search terms;
- Discovery from Hormel and Seaboard Defendants including analyzing responses and objections to Plaintiffs' request for documents, meet and conferring re: same; preparing reports for custodians, prepare reports for search methodology and search terms
- Analysis of custodial list and oversee telephone records subpoenas, review telephone records produced and analyze those records;
- Review, analyze and code documents produced in the action;
- Oversee review of documents produced and analyzed and prepare written memoranda summarizing the evidence from the documents produced; and
- Assist in preparation for depositions and deposition strategy.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 1,781.10 hours. The total lodestar for my firm is \$1,049,439.00. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$101.20 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11th day of May, 2022, at Boston, Massachusetts.

/s/ Jeffrey C. Block

Jeffrey C. Block  
Block & Leviton LLP

*In re Pork Antitrust Litigation*  
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**Exhibit A**

**Lodestar Summary**

Firm: **Block & Leviton LLP**  
Reporting Period: **Inception through February 28, 2022**

<b>Professional</b>	<b>Title</b>	<b>Historic Hourly Rate</b>	<b>Total Hours</b>	<b>Total Lodestar*</b>
Whitney Street (2018)	P	\$750.00	1.5	\$1,125.00
Whitney Street (2019)	P	\$815.00	81.1	\$66,096.50
Whitney Street (2020)	P	\$850.00	182.3	\$154,955.00
Whitney Street (2021)	P	\$900.00	486.2	\$437,580.00
Whitney Street	P	\$350.00	4.9	\$1,715.00
Stephen Teti (2018)	A	\$600.00	4.9	\$2,940.00
Stephen Teti (2019)	A	\$650.00	92.9	\$60,385.00
Stephen Teti (2020)	A	\$675.00	0.8	\$540.00
Stephen Teti	A	\$350.00	4.7	\$1,645.00
Robert Benenson	A	\$350.00	160.0	\$56,000.00
Elizabeth Newman	A	\$350.00	760.0	\$266,000.00
Rachel Murphy	PL	\$275.00	0.3	\$82.50
Elizabeth Davey	PL	\$250.00	1.5	\$375.00
<b>Totals</b>			<b>\$1,781.1</b>	<b>\$1,049,439.00</b>

Title:  
 Partner (P)  
 Associate (A)  
 Paralegal (PL)  
 Of Counsel (OC)  
 Law Clerk (LC)  
 Legal Assistant (LA)

\* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

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**Exhibit B**

**Expense Summary**

Firm: **Block & Leviton LLP**  
Reporting Period: **Inception through February 28, 2022**

<b>Expense</b>	<b>Amount</b>
Court Costs ( <i>i.e.</i> , Filing Fees)	
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	\$101.20
Photocopies (in House)	
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Miscellaneous	
<b>Total</b>	<b>\$101.20</b>

\* Air travel is billed at coach fare.

\*\* \$75 per person per day cap.